

September 13, 2018

Michael H. Pryor
Attorney at Law
202.383.4706 tel
202.296.7009 fax
m Pryor@bhfs.com

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: Accelerating Wireless Broadband Deployment by Removing Barriers to
Infrastructure Investment, WT Docket 17-79.

Dear Ms. Dortch:

On September 11, 2018, Becca Gould, Senior Vice President, Public Affairs, American Tower Corporation (“American Tower”), Liz Hill, Vice President for State and Local Affairs, American Tower, and the undersigned spoke by phone with Erin McGrath, Wireless Legal Advisor to Commissioner Michael O’Reilly. During the call, American Tower expressed its support for the Draft Declaratory Ruling and Third Report and Order, FCC-CIRC 1809-02, released on September 5, 2018 (“Draft Order”).

American Tower also pointed out that some local governments have a mistaken belief that existing macro towers may no longer be necessary in light of the coming deployment of small cells. We discussed the possibility that this viewpoint might inadvertently be bolstered by the Draft Order’s emphasis on the anticipated extent of small cell deployments without also indicating the important role that macro towers play in increasingly heterogeneous network configurations.

We suggested that the Commission could avoid such misapprehensions by adding language regarding the continuing need for macro towers at an appropriate point in the Draft Order. Such language could read as follows: “Although the bulk of new deployment will consist of small cells, the existing macro cell network infrastructure continues to be the foundation of the network and a key component of its overall efficiency and resiliency.”¹

¹ This language could, for example, be inserted as a footnote to the Draft Order’s language in paragraph 24 regarding the extent of anticipated small cell deployments.

Please contact the undersigned if you have any questions.

Sincerely,

/s/ Michael H. Pryor

Michael H. Pryor
Brownstein, Hyatt, Farber, Schreck,
LLP
1155 F Street NW, Suite 1200
Washington, DC 20004
Telephone: (202) 383-4706

17450535